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December 2, 2013
COR-13-089
Federal Express and Email

Director, Air and Waste Management Division
United States Environmental Protection Agency
1200 Sixth Avenue
Seattle, Washington 98101

**SUBJECT: Sumitomo Metal Mining Pogo LLC (Pogo), Unit 412 Incinerator
Test Report November 2013 and Site Specific Operating Limits
Report November 2013.**

Dear Sir or Madame:

Enclosed is the complete test report for the initial performance test of the solid waste incinerator operated by Sumitomo Metal Mining Pogo LLC (Pogo) at the Pogo Mine located near Delta Junction, Alaska. The incinerator is subject to the requirements of the Clean Air Act New Source Performance Standards (NSPS) for Commercial and Industrial Solid Waste Incineration (CISWI) Units, 40 C.F.R. Part 60, Subpart CCCC (Subpart CCCC). Pogo's incinerator is a small, remote incinerator under 40 C.F.R. Part 60 Subpart CCCC and subject to the emission limits in Table 8 of Subpart CCCC.

The initial performance test was conducted during the period of September 29, 2013 through October 3, 2013 in accordance with the methods and procedures described in the test plan prepared and submitted to EPA in September 2013. The enclosed report presents the sampling and analytical procedures, test results, and all field data, calculations, analytical laboratory reports, and quality assurance/quality control documentation generated as part of the initial performance test.

The source test program had two objectives: (1) to conduct the initial performance test of the CISWI unit to demonstrate compliance with the emission limits in Table 8 of Subpart CCCC; and (2) to establish the operating limits identified in Pogo's Petition submitted to EPA in accordance with 40 C.F.R. § 60.2115. EPA approved Pogo's petition on September 27, 2013.

Pogo's petition identified seven incinerator operating parameters for which operating limits would be established during the initial performance test and continuously monitored thereafter. To establish these limits, each of the operating parameters was monitored and recorded by Pogo on each day of performance testing. As

required in 40 C.F.R. § 60.2200(b), Pogo is also submitting the Site Specific Operating Limits Report which provides the values of all seven operating limits established during the initial performance test.


The test program was designed to establish one of the operating limits, the waste composition, according to the approach presented to Pogo by EPA during a September 18, 2013 teleconference meeting. On each day, the waste composition consisted of different percentages of the three components: municipal solid waste (MSW), sewage sludge, and cleanup adsorbs. The highest percentage of each waste component that was burned on one of those days would establish the upper bound (provided that day's test results demonstrated compliance with applicable emission limits). For example the waste composition's highest sludge percentage, 49 percent, occurred on test-day 1, and therefore the upper bound for sludge was established at 49 percent (on an average basis). Similarly, 27 percent adsorbs and 76 percent MSW were established as upper bounds on test-days 2 and 3, respectively.

The waste composition operating limits were established on days 1 through 3 of the test program, because, with the exception of SO₂, the test results for those three days demonstrated compliance with the emission limits of Table 8 of Subpart CCCC.

The waste composition used for testing on day 4, composed of 100 percent MSW, was intended to eliminate the need for an upper bound on the MSW component. However, compliance with the HCl emission limit was not demonstrated on day 4 while burning 100 percent MSW. Therefore, the results of the first 3 day's test runs, comprising three valid runs of each required test method, serve to demonstrate compliance with the applicable emission limits of Subpart CCCC and to establish the operating limits under which the incinerator shall operate.

If you have any questions, please give me a call at 907-895-2879 or email me at Sally.McLeod@smmpogo.com.

Sincerely,



Sally S. McLeod, CEM, REM
Environmental Manager

Attachment: Unit 412 Incinerator Test Report November 2013
Unit 412 Site Specific Operating Limits Report November 2013

Cc: Heather Valdez, EPA
Zach Hedgpeth, EPA
John Pavitt, EPA
Robin Wagner, ADEC
John Rosburg, AECOM
Jeff Hunter, Perkins Coie
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